2

3

4 5

6

7

8 9

10

11

12

13

14 15

16

17

18 19

20

21

22

23 24

25

26 27

STIPULATION AND ORDER

RE EXTENSION OF DEADLINES 2:20-CV-00153-RSM

HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

SUSAN HOLMES, PIERINO DE SIMONE, and ANTONINA DE SIMONE, individuals

Plaintiffs,

v.

U.S. BANKCORP, national banking association,

Defendant.

NO. 2:20-cv-00153-RSM

STIPULATION AND ORDER REGARDING EXTENSION OF **DEADLINES**

STIPULATION

All parties to this action, by and through their undersigned counsel, hereby stipulate and agree as follows:

- 1. The deadline for disclosure of expert testimony under FRCP 26(a)(2), currently set for August 12, 2020, should be continued until September 11, 2020.
- The deadline for filing motions related to discovery, currently set for September 2. 11, 2020, should be continued until October 12, 2020.
- 3. The deadline for the completion of discovery, currently set for October 13, 2020, should be continued to November 7, 2020.
- 4. These stipulated and agreed deadlines would modify the deadlines originally set in the Court's original Order Setting Trial Date and Related Dates (Dkt. #10) ("Case Schedule").

DORSEY & WHITNEY LLP

701 FIFTH AVENUE, SUITE 6100 SEATTLE, WA 98104-7043 PHONE: (206) 903-8800 FAX: (206) 903-8820

Case 2:20-cv-00153-RSM Document 18 Filed 08/11/20 Page 2 of 4

	1	
	2	
	3	
	4	
	5	
	6	
	7	
	8	
	9	
1	0	
1	1	
1	2	
1	3	
1	4	
1	5	
1	6	
1	7	
1	8	
1	9	
2	0	
2	1	
2	2	
2	3	
2	4	
2	5	I

5. The parties have conferred and agree that there is good cause for the relief requested in this Stipulation. The original Case Schedule was established in March 2020, early in the period of the COVID-19 pandemic, and the impacts of the pandemic have delayed the progress of discovery in this case. In addition, the requested extensions are needed to accommodate scheduling issues of the parties and to ensure judicial and party efficiency by allowing the parties additional time to confer about and attempt to resolve discovery and other issues in the case without Court intervention.

This Stipulation is without waiver of any party's right to seek further extensions or 6. other relief at any time.

For these reasons, the parties hereto stipulate and agree to, and respectfully and jointly request entry of, the Order set forth below.

Respectfully submitted this 10th day of August, 2020.

26

27

/s/ Shawn Larsen-Bright

Shawn Larsen-Bright, WSBA #37066

Dorsey & Whitney LLP

701 Fifth Avenue, Suite 6100

Seattle, WA 98104-7043

larsen.bright.shawn@dorsey.com

Attorneys for U.S. Bank National Association

/s/ Eric J. Harrison

Eric J. Harrison, WSBA #46129

Attorney West Seattle

5400 California Ave. SW Seattle, WA 98136

eric@attorneywestseattle.com

Attorneys for Plaintiffs

STIPULATION AND ORDER RE EXTENSION OF DEADLINES 2:20-CV-00153-RSM

DORSEY & WHITNEY LLP 701 FIFTH AVENUE, SUITE 6100 SEATTLE, WA 98104-7043 PHONE: (206) 903-8800

FAX: (206) 903-8820

11 12

13

14

15

16

17 18

19

20

21 22

23

24 25

26

27

ORDER

Based upon the foregoing Stipulation, and for good cause shown, it is hereby ORDERED as follows:

- The deadline for disclosure of expert testimony under FRCP 26(a)(2) is hereby 1. continued until September 11, 2020.
- The deadline for filing motions related to discovery is hereby continued until 2. October 12, 2020.
- The deadline for the completion of discovery is hereby continued to November 7, 3. 2020.

IT IS SO ORDERED this 11th day of August, 2020.

RICARDO S. MARTINEZ

CHIEF UNITED STATES DISTRICT JUDGE

STIPULATION AND ORDER RE EXTENSION OF DEADLINES 4-2:20-CV-00153-RSM

CERTIFICATE OF SERVICE

/s/ Molly Price
Molly Price, Legal Assistant

DORSEY & WHITNEY LLP

701 FIFTH AVENUE, SUITE 6100 SEATTLE, WA 98104-7043 PHONE: (206) 903-8800 FAX: (206) 903-8820